

Chuck McLaughlin <chuckrmc@earthlink.net> 06/16/2005 09:24 AM To Christopher Lichens/R9/USEPA/US@EPA, Tom Perina tperina@ch2m.com

cc Dave Chamberlin <chamberlindc@cdm.com>

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Subject Additional Sources Criteria, Omega Site

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Chris and Tom:

Attached for your reference is a copy of proposed Criteria for evaluating the extent of contamination. This is intended to address specific comment 4. We look forward to discussing this with you this morning



Chuck Criteria for Evaluating Extent of Contamination (2) 6-14.doc

Preliminary Draft

Criteria for Evaluating New Data

One of the objectives of this investigation is to characterize the extent of source area contamination. Criteria are presented here that will be applied to the data as they become available with the intent of determining whether additional sampling is required to characterize the extent of source area contamination.

Extent of Contamination Criteria

- Soil and groundwater samples will be collected at increasing distances away from the former Omega property. Decreasing contaminant concentrations at similar depths with increasing distance from the property will be taken to indicate that the source area lateral extent has been defined in that direction.
- Increasing soil or soil gas contaminant concentrations with increasing depth will result in deeper sampling to the water table.

Criteria are present below regarding how the data will be evaluated with regard to identifying possible other sources of contamination.

Additional Sources Criteria

- Increasing soil contaminant concentrations at similar depths with increasing distance away from the former Omega property will be taken as a possible indication of the presence of another source, though soil concentrations are likely to be quite variable.
- A change in soil contaminant composition with increasing distance from the property that is not explained by degradation will also be taken as a possible indication of the presence of another source.
- A change in soil contaminant fingerprint (i.e., ratio of contaminants) with increasing distance from the property will also be taken as a possible indication of the presence of another source.

Also, the soil boring and MIP data will be evaluated with regard to identifying major contaminant migration pathways from the former Omega property.

Migration Pathway Criteria

- If MIP and/or soil core data indicate a permeable zone of significant thickness, then up and downgradient holes may be bored to see if that zone is continuous and a possible significant migration pathway.
- If significantly elevated detector responses are measured from the MIP in a particular unit (e.g., the capillary fringe), then soil samples may be collected downgradient of that location.